

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

UNITED STATES OF AMERICA,

Appellee

No. 23-3087

v.

JESUS QUEZADA PINA
Appellant

District Court No. 13cr143 (RCL)

**APPELLANT’S MOTION FOR AN EXTENSION OF TIME TO FILE
BRIEF AND JOINT APPENDIX**

COMES NOW Appellant, Jesus Quezada Pina, by and through undersigned counsel and moves this Honorable Court grant an extension in which to file appellant’s brief and joint appendix,¹ which is currently due on November 14, 2025, and requests a new due date of December 15. This request is based upon the following:

- (1) This week, undersigned received an email communication from Mr. Pina requesting he receive a copy of the brief prior to it being filed so that he can discuss it with counsel and make sure his issues are addressed and raised. He also provided additional arguments/issues he wanted undersigned to consider. Undersigned has been drafting

¹ This case is consolidated with appellant Jose Emanuel Garcia Soto, 23-3084.

the brief but will not have time to complete it and discuss it with Mr. Pina by the current November 14 deadline. Nor will undersigned be able to address the additional arguments/issues that Mr. Pina brought up by that deadline;

(2) Undersigned has been drafting the brief without input from counsel for the other appellant. Undersigned expects to provide a draft of her brief to the co-appellant's counsel. Co-appellant's counsel can decide to sign on to the brief, add additional arguments, or file a separate pleading. This will not be accomplished by the November 14 date either and will require additional time.

(3) Undersigned communicated with government counsel in this matter, Chrisellen R. Kolb, Esq. Ms. Kolb does not oppose the extension requested.

WHEREFORE, for the reasons stated and any others this Court deems appropriate, Jesus Quezada Pina, moves this court grant an extension by which to file the consolidated brief and joint appendix to December 15, 2025.

Respectfully submitted,

/s/

Elita C. Amato, Esq.
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Counsel for Appellant
Jesus Quezada Pina
(Appointed by this Court)

CERTIFICATE OF SERVICE

I certify that I filed the foregoing Unopposed Motion for Extension with the Clerk of the United States Court of Appeals for the November 7, 2025.

Chriselle R. Kolb, Appellate Section, Criminal Division, U.S. Attorney's Office for the District of Columbia, counsel for appellee, Chrisellen.R.Kolb@usdoj.gov who is a registered CM/ECF user, will be served by the appellate CM/ECF system.

/s/

Elita C. Amato, Esq.

CERTIFICATE OF COMPLIANCE

1. The unopposed motion for extension complies with type-volume limits because, excluding the parts of the document exempted by Fed. R. App. R. 32(f), this motion contains 471 words.
2. The unopposed motion for extension complies with the typeface and type style requirements because this brief has been prepared in a

proportionally spaced typeface using Microsoft Word 2008, in 14 pt Times New Roman.

Dated this 7th day of November 2025

/s/ Elita C. Amato
Counsel for Appellant